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April 17, 2023

**Via ECF**

Hon. Jennifer L. Rochon, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street, Rom 2220  
New York, New York 10007

Re: *Lance Mincey v. 1199SEIU National Benefit Fund*  
Case No. 21-cv-01070 (JLR)

Your Honor:

We represent the Plaintiff in the above-referenced matter against 1199SEIU National Benefit Fund ("Defendant"). We write, with Defendant's consent, to request an extension of the deadline to file Plaintiff's opposition to Defendant's motion for summary judgment. The current deadline to file the opposition is April 20, 2023, and we request that the deadline be extended to May 15, 2023. This is the first time we are requesting an extension of this deadline.

We have had multiple issues getting ahold of Plaintiff to discuss Defendant's extensive motion for summary judgment. We were just able to reach him on the phone today. As the Court will remember, Plaintiff's opposition papers will heavily rely on Plaintiff's declaration to rebut Defendant's allegations and evidence, since depositions were not taken in this case. As such, we will need additional time to adequately confer with Plaintiff in person about the motion and his detailed declaration. Although we would normally request less time to file the opposition papers, the undersigned is leaving on a pre-scheduled vacation this week and is not returning to the office until May 1, 2023. Thus, the requested extension would essentially provide the undersigned with an additional two weeks to file the papers, which we hope the Court finds acceptable. As part of this request, we are also asking the Court to extend the deadline for Defendant to file their reply papers to May 30, 2023. Defendant consents to this revised briefing schedule.

We thank the Court for its consideration and attention to this matter.

Respectfully submitted,


/s/

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Request **GRANTED**. The deadline for Plaintiff to file his opposition is hereby extended to **May 15, 2023**. The deadline for Defendant to file a reply is extended to **May 30, 2023**. Given the substantial length of this extension, the parties should not expect any further extension of the motion deadlines.

Dated: April 17, 2023  
New York, New York

**SO ORDERED.**

  
**JENNIFER L. ROCHON**  
United States District Judge